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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

WALSH SECURITIES, INC.,

Plaintiff,

vs.

CRISTO PROPERTY MANAGEMENT,
LTD., a/k/a G.J.L. LIMITED; DEK HOMES
OF NEW JERSEY, INC.; OAKWOOD
PROPERTIES, INC.; NATIONAL HOME
FUNDING, INC.; CAPITAL ASSETS
PROPERTY MANAGEMENT &
INVESTMENT CO., INC.; CAPITAL
ASSETS PROPERTY MANAGEMENT,
L.L.C.; WILLIAM KANE; GARY GRIESER;
ROBERT SKOWRENSKI, II; RICHARD
CALANNI; RICHARD DiBENEDETTO;
JAMES R. BROWN; THOMAS BRODO;
ROLAND PIERSON; STANLEY YACKER,
ESQ.; MICHAEL ALFIERI, ESQ.; RICHARD
PEPSNY, ESQ.; ANTHONY M. CICALESE,
ESQ.; LAWRENCE CUZZI; ANTHONY
D'APOLITO; DAP CONSULTING,
INC.; COMMONWEALTH LAND TITLE
INSURANCE CO.; NATIONS TITLE
INSURANCE OF NEW YORK, INC.;
FIDELITY NATIONAL TITLE INSURANCE
CO. OF NEW YORK; COASTAL TITLE
AGENCY; STEWART TITLE GUARANTY
COMPANY; IRENE DiFEO; DONNA PEPSNY;
WEICHERT REALTORS; and VECCHIO
REALTY, INC. d/b/a MURPHY REALTY
BETTER HOMES AND GARDENS,

Defendants.

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: Civil Action No. 97-cv-3496 (DRD)
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: Hon. Dickinson R. Debevoise, U.S.D.J.
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NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiff Walsh Securities, Inc. hereby moves the Court for an Order granting it Leave to File a Fourth Amended Complaint with Right of Relation Back, pursuant to Fed. R. Civ. P. 15(a) and Fed. R. Civ. P. 15(c)(2), in the form of the proposed Order filed herewith, which motion is supported by the accompanying Memorandum of Law and Declaration of Robert A. Magnanini, and which motion is to be heard before the Honorable Michael A. Shipp, United States Magistrate Judge, District of New Jersey, Martin Luther King Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, on the 21 day of July, 2008, at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument if timely opposition is filed.

By: _____ /s/
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Dated: June 27, 2008